

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MOSES LEIJA	§	
	§	
Plaintiff,	§	
	§	
VS.	§	CIVIL ACTION NO.
	§	SA-13-CA-0126-DAE
ALICE RAMOS, CITY OF SAN	§	
ANTONIO, CITY OF POTEET,	§	
AND GRAHAM CENTRAL STATION	§	
	§	
Defendants.	§	
	§	

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**PROPOSED SCHEDULING RECOMMENDATIONS**

The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. A report on alternative dispute resolution in compliance with Local Rule CV-88 shall be filed by: **December 15, 2013**.
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by **December 15, 2013**, and each opposing party shall respond, in writing, by **December 29, 2013**.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by **January 18, 2014**.
4. Any party asserting claims for affirmative relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by **February 16, 2014**, Parties resisting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties but not file the materials required by FED. R. CIV.

P. 26(a)(2)(B) by April 3, 2014. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within fifteen (15) days of receipt of the written report of the expert's proposed testimony or within fifteen (15) days of the expert's deposition, if a deposition is taken, whichever is later.

6. The parties shall complete all discovery on or before May 18, 2014. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than June 18, 2014. Responses to dispositive motions shall be filed not later than fourteen (14) days after the filing of the motion. Dispositive motions as defined in Local Rule CV-7(c) and responses to dispositive motions shall be limited to twenty (20) pages. A reply in support of a dispositive motion shall be filed not later than seven (7) days after the filing of the response to the motion and shall be limited to ten (10) pages.

8. The hearing on all dispositive motions will be set by the Court after all responses and replies have been filed.

9. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16(e)-(g) regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

10. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on August 23, 2013, and the parties have agreed as to its contents.

Respectfully submitted,

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